

### **REMARKS**

The Examiner has rejected claims 1 through 66 under 35 U.S.C. §103 as being obvious. In view of the above amendments and the following remarks, the applicants respectfully request the Examiner to reconsider the pending rejections.

#### **First Group of the Section 103 rejections**

The Examiner has rejected claims 1 through 14, 23 through 36 and 45 through 58 under 35 U.S.C. §103 as being obvious over Driscoll in view of Cragun et al.

Newly amended independent claims 1, 23 and 45 each explicitly recite “determining a specific area occurrence value based upon a first number of occurrence of each of the word candidates in the specified area in the predetermined text database in relation to at least a second number of occurrence of the word candidates in the predetermined text database.” The newly amended independent claims clearly require the above determination of “a specific area occurrence value” using the “first number” and the “second number.”

In view of the above explicitly recited patentable features, the applicants understand the disclosures of the cited prior art references in the following manner. The Driscoll reference discloses a “METHOD AND SYSTEM FOR SEARCHING FOR RELEVANT DOCUMENTS FROM A TEXT DATABASE COLLECTION, USING STATISTICAL RANKING, RELEVANCY FEEDBACK AND SMALL PIECES OF TEXT.” The Driscoll reference discloses a formula in column 6 in relation to the definitions in column 5 for calculating the importance of a query word based upon the frequency in appearance in different documents. The IDF (inverse document frequency) generally means that the word which appears in a fewer documents means more important than other words which appear in more documents.

The Cragun et al. reference discloses “FRONT-END FACTOR SEARCH CRITERIA,” in which a search expression includes a search term having associated

weight criteria. The weight criteria are associated with a specific search term and have characteristics related to formats such as BOLD and FONTSIZE, location in the text such as HEADER and SUMMARY. Thus, for example, when a given search term is found in multiple documents, the documents are sorted based upon the presence or absence of the weight criteria such as associated with the found searched term. Cragun et al. determine whether or not the weight criteria are absent or present in the searched terms as disclosed in Paragraphs [40] through [44].

The Examiner has alleges in the Office Action that the Driscoll reference discloses every element of independent claims 1, 23 and 45 except for the determination of “a specific area occurrence value of each of the word candidates....” For the admitted lack of the disclosure or suggestion, the Examiner has additionally cited the Cragun et al. reference. The Examiner has further alleged that the Cragun et al. reference discloses the determination of “a specific area occurrence value” by Paragraph [13]. As already described above, the weight criteria in the Cragun et al. reference is not used to determine “a specific area occurrence value.” Let alone, the Cragun et al. reference fails to disclose, teach or suggest the use of weight criteria for “a first number of occurrence of each of the word candidates in the specified area in the predetermined text database in relation to at least a second number of occurrence of the word candidates in the predetermined text database.” In any event, the weight criteria in the Cragun et al. reference are used to determine merely the absence or presence of the characteristics in the searched terms.

In view of the above patentable distinction, even if the two cited references are combined, the applicants respectfully submit to the Examiner that the combined disclosures still fail to teach, disclose or suggest the explicitly recited subject matter limitations of newly amended independent claims 1, 23 and 45. Thus, it would not have been obvious to one of ordinary skill in the relevant prior art to provide the above discussed patentable features of newly amended independent claims 1, 23 and 45 based upon the cited references alone or in combination.

Dependent claims 2 through 14, 24 through 36 and 46 through 58 ultimately depend from newly amended independent claims 1, 23 or 45 and incorporate the

patentable features of the newly amended independent claims. Therefore, the applicants respectfully submit to the Examiner that the rejections of claims 1 through 14, 23 through 36 and 45 through 58 under 35 U.S.C. §103 as being obvious over Driscoll in view of Cragun et al. should be withdrawn.

Second Group of the Section 103 rejections

Furthermore, the Examiner has rejected claims 15 through 22, 37 through 44 and 59 through 66 under 35 U.S.C. §103 as being obvious over Driscoll in view of Cragun et al. and further in view of Imaichi et al.

Newly amended independent claims 19, 41 and 63 each explicitly recite “a first specific area occurrence value based upon a first number of occurrence of the word candidates in a specified area in a first text database in relation to at least a second number of occurrence of the word candidates in the first text database.” In addition, newly amended independent claims 19, 41 and 63 each explicitly recite “a second specific area occurrence value based upon a third number of occurrence of the word candidates in the specified area in a second text database in relation to at least a fourth number of occurrence of the word candidates in the second text database.” The newly amended independent claims clearly require the above determination of “a first specific area occurrence value” using the “first number” and the “second number” as well as “a second specific area occurrence value” using the “third number” and the “fourth number.”

In view of the above explicitly recited patentable features, the applicants understand the disclosures of the cited prior art references in the following manner. As already discussed above, the Driscoll reference discloses a formula in column 6 in relation to the definitions in column 5 for calculating the importance of a query word based upon the frequency in appearance in different documents. The IDF (inverse document frequency) generally means that the word which appears in a fewer documents means more important than other words which appear in more documents.

As already discussed above, the Cragun et al. reference discloses a search expression including a search term having associated weight criteria. The weight criteria are associated with a specific search term and have characteristics related to formats such as BOLD and FONTSIZE, location in the text such as HEADER and SUMMARY. Thus, for example, when a given search term is found in multiple documents, the documents are sorted based upon the presence or absence of the weight criteria such as associated with the found searched term. Cragun et al. determine whether or not the weight criteria are absent or present in the searched terms as disclosed in Paragraphs [40] through [44].

Furthermore, the Imaichi et al. reference discloses a "DOCUMENT RETRIEVAL SYSTEM AND SEARCH SERVER" for performing an associative search by correlating a plurality of document databases and sorting the searched document databases according to the history of the associative searches. The associative search is conducted by placing a weight on the search query terms based upon a predetermined weight table containing summary words that characterize a group of specific documents. Using the weighed search words, a search server returns documents containing searched words and having a total weight values reflecting a high degree of correlation.

The Examiner has alleges in the Office Action that the Driscoll reference discloses every element of independent claims 19, 41 and 63 except for the determination of "a first specific area occurrence value" and "a second specific area occurrence value." For the admitted lack of the disclosure or suggestion, the Examiner has additionally cited the Cragun et al. reference. The Examiner has further alleged that the Cragun et al. reference discloses the determination of the first or second "specific area occurrence value" in Paragraph [13]. As already described above, the weight criteria in the Cragun et al. reference is not used to determine the first or second "specific area occurrence value." Let alone, the Cragun et al. reference fails to disclose, teach or suggest the use of weight criteria for "a first number of occurrence of the word candidates in the specified area in a first text database in relation to at least a second number of occurrence of the

word candidates in the first text database.” Similarly, the Cragun et al. reference also fails to disclose, teach or suggest the use of weight criteria for “a third number of occurrence of the word candidates in the specified area in a second text database in relation to at least a fourth number of occurrence of the word candidates in the second text database.” In any event, the weight criteria in the Cragun et al. reference are used to determine merely the absence or presence of the characteristics in the searched terms.

Furthermore, the Examiner has admitted on page 7 that the Driscoll and Cragun et al. references fail to teach the claimed limitation of determining “a first text database occurrence value” and “a second text database occurrence value.” For the admitted lack of the disclosure or suggestion, the Examiner has additionally cited the Imaichi et al. reference. The Examiner has further alleged that the Imaichi et al. reference discloses the determination of the first and second “specific area occurrence value[s]” as well as “a database occurrence value” in Paragraphs [36] through [38]. As discussed above, the Imaichi et al. reference discloses a total of the weighted values for each of the searched documents containing the selected search words. The total weight values are not related to the first or second “specific area occurrence value” since the total weight value is not location-specific occurrence of the words. Each weight is predetermined based upon the descriptive characteristics for a specific group of documents. Thus, the Imaichi et al. reference is not relevant to the “database occurrence value.”

In view of the above patentable distinctions, even if the three cited references are combined, the applicants respectfully submit to the Examiner that the combined disclosures fail to teach, disclose or suggest the explicitly recited subject matter limitations of newly amended independent claims 19, 41 and 63. Thus, it would not have been obvious to one of ordinary skill in the relevant prior art to provide the above discussed patentable features of newly amended independent claims 19, 41 and 63 based upon the cited references alone or in combination.

Dependent claims 20 through 22, 42 through 44 and 64 through 66 ultimately depend from newly amended independent claims 19, 41 or 63 and incorporate the patentable features of the newly amended independent claims. Dependent claims 15

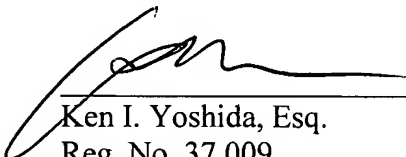
through 18, 37 through 40 and 59 through 62 ultimately depend from newly amended independent claims 1, 23 or 45 and incorporate the patentable features of the newly amended independent claims as already discussed with respect to the first group of the section 103 rejections. Therefore, the applicants respectfully submit to the Examiner that the rejections of claims 15 through 22, 37 through 44 and 59 through 66 under 35 U.S.C. §103 as being obvious over Driscoll in view of Cragun et al. and further in view of the Imaichi et al. should be withdrawn.

### **Conclusion**

In view of the above amendments and the foregoing remarks, Applicant respectfully submits that all of the pending claims are in condition for allowance and respectfully request a favorable Office Action so indicating.

Respectfully submitted,

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